



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

October 13, 1995

In Reply  
Refer To: HW-113

Mr. Robert L. Geddes  
Senior Environmental Engineer  
Monsanto Chemical Company  
P.O. Box 816  
Soda Springs, ID 83276

Subject: Conference Call to Discuss Comments on the  
Revised Draft Phase II Feasibility Study  
Development and Screening of Remedial Alternatives

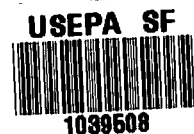
Dear Mr. Geddes:

The purpose of this letter is to provide further clarification of some of the U.S. Environmental Protection Agency's (EPA) comments on Monsanto's August 31, 1995, Draft Phase II Feasibility Study Development and Screening of Remedial Alternatives (DSRA). Based on our conference call, it appears that most of the comments were straightforward and will be addressed. The exceptions, along with one other issue we discussed, are discussed below and should be addressed in your October 17, 1995 response letter to EPA.

The comments requiring clarification were:

- #8) This comment stands, with clarification. As stated in the original comment, EPA concurs with Monsanto's decision to continue evaluating remedial alternatives for on-site source piles. It is still not clear, however, how the effectiveness of different alternatives will be evaluated (and, if necessary, measured), given Monsanto's decision not to propose PRGs or TCLs for on-site source materials. The question arises in part because the RAO for on-site source materials is to "prevent release and migration of dust from on-site materials to off-site soils **above levels that may pose unacceptable cumulative risks..**" [bold added for emphasis]. Since the purpose of the FS is to evaluate alternatives to address the RAOs, it is not clear how Monsanto proposes to evaluate or compare the effectiveness of alternatives without TCLs or PRGs. In your reply, please clarify how this issue will be addressed in the Phase III FS.

AR 2.1



41171

- #11) The original comment stands, with clarification based on our conference call. First and foremost, EPA's comments direct Monsanto to shift the focus of the DSRA from the  $5 \times 10^{-4}$  level to  $1 \times 10^{-4}$ , consistent with earlier EPA comments. However, the requirement that localized ecological concerns should be addressed as part of TCL-4 per comment 21 (actually #23) was apparently not clear as written, and based on our discussions is modified as follows:

EPA does not fully agree with or approve the reference to ecological risks being "acceptable" at TCL-4 as shown on Table 2-4, while at the same time agreeing that it would serve little purpose to duplicate the ecological cleanup goals shown for TCL-6. EPA also understands Monsanto's desire to highlight the uncertainty associated with the conclusion that ecological impacts may exist. So long as the statement that ecological risks are "acceptable" is removed from Table 2-4, at least two alternatives would be acceptable. One would be to include ecological risks in the revised TCL-4 (at the  $1 \times 10^{-4}$  level for human health) but not to establish specific TCLs, instead discussing qualitatively how localized ecological concerns may or may not be likely, but if any are really present, they would be addressed if these most contaminated soils were addressed. Another option would be to discuss human health and ecological risks and cleanup options in separate alternatives. This might be acceptable, but seems to create more work and text than are necessary to provide adequate information for decision-makers. In your reply, please clarify how this issue will be addressed in the Phase III FS.


Finally, there is the issue of radon, which we discussed at our meeting in Seattle but which was inadvertently omitted from the September 29th approval with comments. As you know, we were not able to quantitatively estimate radon risks at this site because the site characteristics differ significantly from the available models, which are used to predict indoor radon from soil concentrations of radium. Nonetheless, we have made a qualitative assessment that the residual Radium will increase radon risk. Therefore, it is important that the FS address radon; fortunately we think this can be done with minimal additional effort.

Section 3.3.2.4 (deed restrictions) already addresses the kind of actions that could be taken to mitigate radon in general, and should be expanded to include radon mitigation as a specific example. Our information suggests radon-resistant construction costs are low, on the order of \$0.10 per square foot. It seems reasonable, then, to consider including radon-resistant

construction and testing of new buildings in the deed restrictions used as part of the institutional controls when residual radium above background concentrations is left in place. This same approach was recently adopted in the record of decision for the Teledyne Wah Chang site in Albany, Oregon. In your reply, please clarify how this issue will be addressed in the Phase III FS.

If you have any questions about this letter please call me as soon as possible at (206) 553-2100.

Sincerely,

  
Timothy H. Brincefield  
Superfund Site Manager

Enclosure

cc: Gordon Brown, IDHW  
Catherine Krueger, EPA Superfund Unit Chief  
Charles Ordine, EPA Associate Regional Counsel  
Andy Hafferty, Ecology and Environment